

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re:

ROBERT P. DIBIASIO, JR. and  
KRISTIN M. DIBIASIO,

Debtors

Chapter 13

Case No. 18-13378 (AMC)

NOTICE OF MOTION, RESPONSE DEADLINE  
AND HEARING DATE

Franklin Mint Federal Credit Union has filed a motion for an order (i) vacating the automatic stay pursuant to 11 U.S.C. § 362(d) and Rule 4001(a) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and a waiver of the fourteen (14) day stay of such an order pursuant to Bankruptcy Rule 4001(a)(3) or, in the alternative, (ii) compelling adequate protection pursuant to 11 U.S.C. § 363(e).

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before fourteen (14) days from the date of this notice, you or your attorney must do all of the following:

(a) file an answer explaining your position at

United States Bankruptcy Court  
900 Market Street, Suite 400  
Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the movant's attorney:

Corinne Samler Brennan, Esquire  
Klehr Harrison Harvey Branzburg LLP  
1835 Market Street, Suite 1400  
Philadelphia, PA 19103  
T: (215) 569-3393  
F: (215) 569-6603

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Ashely M. Chan on September 4, 2018 at 11:00 a.m. in Courtroom 4, United States Bankruptcy Court, 900 Market Street, Philadelphia, PA 19107. Unless the court orders otherwise, the hearing on this contested matter will be an evidentiary hearing at which witnesses may testify with respect to disputed material factual issues in the manner directed by Fed. R. Bankr. P. 9014(d).

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's Office at 215-408-2800 to find out whether the hearing has been canceled because no one filed an answer.

Date: August 2, 2018